

## REMARKS

In the Office Action mailed August 14, 2003, Claims 1-11 are rejected under 35 U.S.C. 103 (a) as being unpatentable over applicant's admitted prior art in view of US Patent 5,809,331 to Staats et al. (referred to herein as the "'331 patent.") Claim 1 in the present application is presented here:

1. In a serial bus module having a plurality of link devices, a method for presenting the plurality of link devices as separate nodes, the method comprising:
  - c) creating an individual configuration ROM image for each link device in said plurality of link devices in said serial bus module; and
  - d) presenting said configuration ROM images for each said link device.

Applicant asserts that both the admitted prior art as well as the '331 patent do not contain the limitation of claim 1, namely the presenting of a plurality of link devices as separate nodes *within a single serial bus module*. Directing the Examiner's attention to the present application as filed at page 4, second paragraph, FIG. 2 illustrates *a* (singular) typical module device 1 having first and second nodes 2a, 2b. Nodes 2a and 2b are not the same as "node" as described in the '331 patent on column 1, lines 37-54. Nodes as described in the '331 patent at this citation are at the same logical level as module 1 in FIG. 2 of the present application. While it is unfortunate that terminology in the '331 patent ("node") conflicts with "node" as used in the present application, there is ample support for this assertion in the definitions used in the Background of the present application.

As described in the Background of the Invention of the present application as well as the summary and detailed description, the present invention solves the problem in the existing prior art of distinctly addressing multiple nodes in a serial bus module. By contrast, the figures and specification of the '331 patent do not show any single module

having multiple nodes as discussed in the present application. Examiner's attention is directed to FIG. 1 of the '331 patent, in which numerous nodes (modules) are illustrated. However, none of them has multiple subunits (referred to as "nodes" in the present application) presented within.

Applicant asserts that because the '331 patent doesn't even address the problem referred to in the background of the present application, and merely describes this aspect of the existing prior art in a more basic form, the '331 patent, when viewed in light of Applicant's admitted prior art, does not make obvious the present invention.

In response to Examiner's assertion that Ito et al (US Patent 6,529,522) teaches the motivation to combine references at col. 19, lines 8-10, Applicant respectfully traverses this rejection.

Directing attention to MPEP 2143.02, page 2100-120, Examiner is reminded that prior art must be considered in its entirety, including disclosures that teach away from the claims. Ito similarly fails to teach the limitations of the present invention as claimed, and merely states the following:

Each device can judge the function provided therein and the supported communication protocol by reading the content of the unit directory 1103.

However, the devices referred to are devices such as digital cameras, printers and PCs. These devices are provided with 1394 interfaces (see Ito, col.18, line 13 – col. 19, line 10. The limitations of the existing 1394 interfaces are the motivation behind the present invention. In the context of this, Ito at col. 19 lines 8-10 cannot suggest the improvement provided by the present invention, nor the combination with Staats, because like Staats, Ito fails to address the problem. Even if there was a suggestion to combine references, the limitations of the claims of the present invention are not taught, suggested, or otherwise disclosed in the prior art.

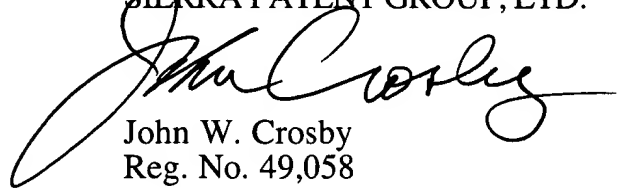
For the above reasons, Applicant respectfully submits that the 35 USC § 103 rejections have been traversed. Applicant respectfully requests that all the claims be allowed over the prior art.

On the basis of the above remarks, early consideration of this application and early allowance are respectfully requested.

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Respectfully submitted,  
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